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Hearing Date: TBD  
Objections Due: TBD

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

East Broadway Mall, Inc.,

Case No. 19-12280 (DSJ)

Debtor.

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**DEBTOR'S NOTICE OF MOTION UNDER FRCP 60(b)**  
**FOR RELIEF FROM STIPULATION AND ORDER**

**PLEASE TAKE NOTICE**, that on \_\_\_\_\_ at \_\_\_\_\_ .m. a hearing (the "Hearing") will be held via Zoom before the Honorable David S. Jones of the United States Bankruptcy Court for the Southern District of New York (the "Court"), One Bowling Green New York, NY 10004 to consider the Debtor's motion for entry of an order granting the Debtor relief from the Stipulation and Order entered on June 22, 2022; and for such other and further relief as this Court deems just and proper. The motion is pursuant to Federal Rule of Civil Procedure 60(b) made applicable to this bankruptcy proceeding by Federal Rule of Bankruptcy Procedure 9024.

**PLEASE TAKE FURTHER NOTICE**, that objections, if any, to the motion must be in writing setting forth with particularity the reasons therefore and served upon Sarah M. Keenan, Esq., at the address set forth below, and the Clerk of the Bankruptcy Court with a hard copy delivered directly to

chambers pursuant to Local Rule 9070-1 so that it is received no later than \_\_\_\_\_, 2023 at 5:00  
p.m.

Dated: Melville, New York  
June 22, 2023

SFERRAZZA AND KEENAN, PLLC  
Attorneys for the Debtor and Debtor in  
Possession

By: /s/ Sarah M. Keenan  
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